

**REMARKS**

The Examiner's comments in the Office Action mailed April 4, 2008 have been carefully considered. Claims 1-20 remain pending in the application. Claims 1, 11, 14, 17, and 19 have been amended. Support for these amendments can be found throughout the specification and figures. No new matter has been added.

Reexamination and allowance of the pending claims are respectfully requested.

**Objections to the Drawings**

Formal objection has been made to the drawings under 37 CFR 1.83(a) for not showing the longitudinal axis of the insulation-displacement terminal contacts lie parallel to the surface of the printed circuit board when the conductor connection module is in the installed state on the printed circuit board. Applicant respectfully disagrees.

Applicants respectfully point out that FIG. 4 was amended in a preliminary amendment filed January 23, 2006 to correct the orientation of the longitudinal axis L. Further, FIG. 2 was amended on January 11, 2008 to show the longitudinal axes L of the insulation-displacement terminal contacts lying parallel to the major surface of a printed circuit board 6 when the conductor connection module is in an installed state on the printed circuit board. Support for these amendments can be found in the specification as filed. Accordingly, withdrawal of the rejection is respectfully requested.

**Claim Objections**

Formal objection has been made to claims 1-20. The Office Action asserts that "[b]ecause the claims recited that the first contact area is in form of an insulation displacement terminal contact, it appears that the longitudinal axes of the insulation displacement terminal contacts does not lie parallel to the surface or major surfaces of the printed circuit board." See page 3 of the Office Action. Applicant respectfully disagrees.

As noted above, FIGS. 2 and 4 have been previously amended to show the longitudinal axes L of the insulation-displacement terminal contacts lying parallel to the major surface of a printed circuit board 6 as disclosed in the specification as filed. Accordingly, withdrawal of the rejection is respectfully requested.

### **Claim Rejections**

Claims 1-3, 7-11, and 16 have been rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 4,591,225 to Squitieri (hereinafter "Squitieri") in view of DE 9400303 (hereinafter "the German reference"). Applicant respectfully traverses the rejection.

Claim 1 recites, in part, an integral housing extending from a first end at which a plurality of insulation-displacement terminal contacts are arranged to a second end at which at least one contact pin is arranged.

The combination of Squitieri and the German reference does not disclose or suggest an integral housing extending from a first end at which an insulation-displacement terminal contact is arranged to a second end at which a contact pin is arranged.

The Office Action suggests it would have been obvious to replace the tuning fork-like contacts 60 of the receptacle assembly 20 with insulation-displacement terminal contacts. See page 4 of the Office Action. The Office Action asserts the results of such a modification are predictable in view of the German reference, which shows a contact area having insulation-displacement terminal contacts. Applicant respectfully disagrees with these suggestions.

Squitieri is directed to an improved plug and receptacle connector arrangement. See *Squitieri*, Abstract. Replacing the tuning-fork contacts 60 of Squitieri with insulation-displacement terminal contacts would destroy the functionality of the receptacle assembly 20. The receptacle assembly 20 would be unable to mate with the plug connector 30. See *Squitieri*, column 2, lines 52-59. "If [the] proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification." M.P.E.P. § 2143.01 (V) (citing *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984)).

For at least these reasons, Squitieri would not lead a person skilled in the art to the invention of claim 1, even in view of the German reference. Claims 2, 3, and 7-10 depend from claim 1 and are allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 1-3 and 7-10 are respectfully requested. Applicant does not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claim 11 recites, in part, an integral housing which holds contact elements including insulation-displacement terminal contacts and contact pins.

The combination of Squitieri and the German reference does not disclose or suggest an integral housing which holds contact elements including insulation-displacement terminal contacts and contact pins.

As noted above, the Office Action suggests it would have been obvious to replace the tuning fork-like contacts 60 of the receptacle assembly 20 with insulation-displacement terminal contacts. See page 4 of the Office Action. The Office Action further suggests the results of such a modification are predictable in view of the German reference. Applicant respectfully disagrees with these suggestions.

As noted above, replacing the tuning-fork contacts 60 of Squitieri with insulation-displacement terminal contacts would destroy the functionality of the receptacle assembly 20. The receptacle assembly 20 would be unable to mate with the plug connector 30. See *Squitieri*, column 2, lines 52-59. "If [the] proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification." M.P.E.P. § 2143.01 (V) (citing *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984)).

For at least these reasons, Squitieri would not lead a person skilled in the art to the invention of claim 11, even in view of the German reference. Claim 16 depends from claim 11 and is allowable for at least the same reasons. Withdrawal of the rejection and allowance of claims 11 and 16 are respectfully requested. Applicants do not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claims 4-6, 12-15, and 17-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Squitieri in view of the German reference, and further in view of U.S. Patent No. 6,050,845 to Smalley, Jr. et al. (hereinafter "Smalley") and U.S. Patent No. 6,095,854 to Sommer et al. (hereinafter "Sommer"). Applicant respectfully traverses the rejection.

Claims 4-6 depend from claim 1 and are allowable over the combination of Squitieri and the German reference for at least the same reasons as discussed above with respect to claim 1. Smalley and Sommer do not overcome the shortcomings of Squitieri and the German reference. Neither Smalley nor Sommer disclose or suggest an integral housing extending from a first end at which an insulation-displacement terminal contact is arranged to a second end at which a contact pin is arranged. Further, neither Smalley nor Sommer suggests how Squitieri can be modified to replace the tuning-fork contacts 60 of Squitieri with insulation-displacement terminal contacts without destroying the functionality of the receptacle assembly 20.

For at least these reasons, Squitieri would not lead a person skilled in the art to the invention of claims 4-6, even in view of the German reference, Smalley, and Sommer. Withdrawal of the rejection and allowance of claims 4-6 are respectfully requested. Applicants do not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

Claims 12-15 and 17-20 depend from claim 11 and are allowable over the combination of Squitieri and the German reference for at least the same reasons as discussed above with respect to claim 11. Smalley and Sommer do not overcome the shortcomings of Squitieri and the German reference. Neither Smalley nor Sommer disclose or suggest an integral housing which holds contact elements including insulation-displacement terminal contacts and contact pins. Further, neither Smalley nor Sommer suggests how Squitieri can be modified to replace the tuning-fork contacts 60 of Squitieri with insulation-displacement terminal contacts without destroying the functionality of the receptacle assembly 20.

For at least these reasons, Squitieri would not lead a person skilled in the art to the invention of claims 12-15 and 17-20, even in view of the German reference, Smalley, and Sommer. Withdrawal of the rejection and allowance of claims 12-15 and 17-20 are respectfully requested. Applicants do not otherwise concede the correctness of the rejection and reserve the right to make additional arguments if necessary.

**Conclusion**

In view of the above amendments and remarks, Applicant respectfully requests a Notice of Allowance. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone the undersigned at the below-listed telephone number.

Respectfully submitted,

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